

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JAMES W. HARPEL,

Plaintiff,

v.

RONALD A. NICHOLSON

Defendant.

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Civil Action No.: 1:12-cv-10280-RWZ

STIPULATED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Pursuant to Fed. R. Civ. P. 6(b) and 12(a)(4) and good cause shown, Defendant Ronald A. Nicholson hereby moves to extend the time within which he has to answer or otherwise respond to Plaintiff's complaint by an additional six days in light the ongoing business disruptions caused by the aftermath of Hurricane Sandy and the resulting difficulties counsel faces in consulting with Defendant Nicholson. No party will be prejudiced by the relief requested; and Plaintiff has stipulated to this further extension of time for Defendant to respond to the Complaint up to and including November 13, 2012.

WHEREFORE, Defendant requests that its motion be allowed.

Dated: November 6, 2012

Respectfully submitted,
Defendant Ronald A. Nicholson,
By his attorneys,

/s/ James J. Regan
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Assented To:
Plaintiff James W. Harpel,
By his attorneys,

/s/ Daniel J. Murphy

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on November 6, 2012.

/s/James Regan